

# TRAUB LIEBERMAN

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November 11, 2022

*Via ECF Only*

Hon. Katharine H. Parker, U.S.M.J.  
U.S. District Courthouse  
500 Pearl Street, Room 750  
New York, New York 10007

Re: *Graham Chase Robinson v. Robert De Niro et al.*  
Civil Action No.: 19cv9156 (LJL) (KHP) (the “Action”)

Dear Judge Parker:

This office represents Defendant Robert De Niro, and serves as co-counsel, along with Tarter Krinsky & Drogin LLP, for Defendant Canal Productions, Inc. (collectively, “Defendants”). We write to respectfully request that the Court grant Defendants two additional days to comply with the Court’s November 1, 2022 Order (ECF Doc. #298) (the “Order”), up to November 16, 2022.

On November 1, 2022, the Court denied the parties’ joint motion to temporarily file all summary judgment papers under seal until the completion of briefing. In the Order, the Court directed the parties to file a renewed motion to seal as to limited documents or excerpts thereof, and to file all papers relating to the respective motions on the public docket, by November 14, 2022. Following entry of the Order, all counsel have met and conferred on two occasions and otherwise collaborated extensively via email and telephone calls to share proposed redactions and resolve disputes relating to proposed redactions. The parties have made significant progress through the foregoing efforts.

In compliance with the Order, Plaintiff’s counsel intends to file a joint letter with the Court on November 14 identifying the parties’ agreement and/or disagreement as to particular documents or excerpts to be filed under seal, and to otherwise file the documents relating to Plaintiff’s motion on the public docket.

Due to the volume of documents at issue and the extensive amount of collaboration in which counsel have engaged with respect to areas of proposed redactions, Defendants respectfully request an extension of two days, up to November 16, for their counsel to file their joint letter, akin to that which Plaintiff’s counsel will file on November 14. If the Court grants this request for a brief extension of time, it will allow the parties’ counsel to continue trying to resolve disputes relating to

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certain proposed redactions, among other things. Defendants respectfully submit that this brief extension of time would not impact any other existing deadline.

While Plaintiff's counsel has not had the opportunity to review the content of the instant application, Plaintiff's principal counsel has indicated that she consents to an extension of time for the submission of proposed redactions to Defendants' summary judgment filings and the associated letter motion setting forth the parties' positions concerning the proposed redactions.

We thank the Court for its consideration of the foregoing.

Respectfully submitted,

**TARTER KRINSKY & DROGIN LLP**

**TRAUB LIEBERMAN STRAUS  
& SHREWSBERRY LLP**

/s/ Laurent S. Drogin

/s/ Gregory R. Bennett